



December 12, 2018

To: the Federal Communications Commission

Subject: ex parte Comments on Docket 16-239 (Amateur Radio Symbol Rate NPRM)

I am writing on behalf of the Board of Directors of *the Seven Seas Cruising Association (SSCA)* to *fully endorse* the ARSFI response to Ted Rappaport regarding the completion of Docket 16-239. The Seven Seas Cruising Association is the oldest and largest association of full-time recreational boating cruisers in the world with thousands of members. Many of our amateur radio members cruise on their own vessels to all corners of the globe, and rely heavily on the use of high frequency amateur radio for their weather information, e-mail data, and other information that pertains to the safety and well being of the cruising amateur radio operator.

Personally, prior to my retirement, I was involved in critical Anti-Terrorism work and served on the Attorney General's Anti-Terrorism Task Force and handled several Terrorism related cases within the Department of Justice. The attempts to argue that any danger inheres in the use of high-speed communications protocols in the Amateur Band is ludicrous.

We are very concerned about the social media and Internet campaign led by Theodore Rappaport to thwart the future use of modern ARQ protocols for digital communications by vessels at sea. From my own observation, and that of our Board of Directors and officers, the fact that we see a continual increase in the number of licensed amateur radio operators in the cruising community is testimony to the critically useful role of amateur radio toward the safety and well-being of those who sail off-shore on the high seas, both for SSB voice and digital communications.

The entire amateur radio sailing community has been waiting patiently for the Commission to finalize Docket 16-239 in order to increase the throughput efficiency of the more modern OFDM protocols used in amateur radio today, worldwide. The use of ARQ digital protocols to include the Pactor 3 protocol is by far the most popular form of communications for these cruisers. Of course, in addition to SSB voice communications on the amateur spectrum, the new modern digital protocols now allow for large and accurate messaging to take place. Such messages contain needed weather information as well as specific location notification for our family

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and friends. It is information that is just not possible to provide via SSB voice. Through the Winlink system, and with the assistance of the US Coast Guard and other such services of other governments, lives and boats are saved from disasters on a continual basis<sup>1,2</sup>.

With the exception of the United States, Pactor 4 is allowed, worldwide. As the ARFI response points out, Pactor 4, which currently exceeds the current FCC Part 97 antiquated symbol rate rule, but which is approximately twice the speed at the same occupied bandwidth as the less efficient now allowable Pactor 3, is not allowed use by the US amateur radio operator. The deletion of the antiquated symbol rate rule would, in fact, allow more throughput using the same FCC Part 97.221 sub-bands.

Under the threatening *misinformation* touted by Rappaport, If ARQ digital use were to be interrupted, or even come to temporary halt, it would have a devastating effect of the safety and well-being of US cruisers around the world, many who are amateur radio operators that rely on Pactor and other ARQ protocols for weather, and other vital safety information.

Please take our concerns into consideration when deciding on the future of this most important means of communications to world voyagers who hold amateur radio licenses.

Very Respectfully,

Ed Kelly  
President  
Seven Seas Cruising Association

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<sup>1</sup> <http://www.arrl.org/news/robin-walbridge-kd4ohz-missing-at-sea-after-sinking-of-tall-ship-em-bounty-em-ship-s-electrician-dou>

<sup>2</sup> <http://www.nws.noaa.gov/os/marine/marob.htm>